

1 BRIAN STRETCH (CABN 132612)
2 Acting United States Attorney

3 DAVID R. CALLAWAY (CABN 121782)
4 Chief, Criminal Division

5 KATHRYN HAUN (DCBN 484131)
6 WILLIAM FRENTZEN (LABN 24421)
7 Assistant United States Attorneys

8 450 Golden Gate Avenue, Box 36055
9 San Francisco, California 94102-3495
10 Telephone: (415) 436-7200
11 FAX: (415) 436-7234
12 Kathryn.haun@usdoj.gov
13 William.frentzen@usdoj.gov

14 RAYMOND N. HULSER (MABN 551350)
15 Chief, Public Integrity Section

16 RICHARD B. EVANS (DCBN 441494)
17 Trial Attorney

18 1400 New York Avenue, N.W.
19 Washington, D.C. 20005
20 Telephone: (202) 353-7760
21 Richard.B.Evans@usdoj.gov

22 Attorneys for United States of America

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 UNITED STATES OF AMERICA) NO. CR 15-CR 319-001 RS
27 v.)
28 SHAUN W. BRIDGES) UNITED STATES' OPPOSITION TO
29 (A/K/A "NUMBER 13"),) DEFENDANT'S MOTION FOR RELEASE OF
30 Defendant.) PASSPORT
31 _____)
32 _____)
33 _____)
34 _____)
35 _____)

36 The United States, through its undersigned attorneys, hereby opposes the motion filed by defendant
37 Shaun W. Bridges for the return of his passport.

1 As indicated in defendant's motion, Bridges surrendered his passport to the Pretrial Services Office
2 for the Northern District of California in accordance with the conditions for release placed upon him by
3 this Court following his arrest on complaint. Since then, Bridges pled guilty to a two-court Information
4 charging him with money laundering and obstruction of justice. On December 7, 2015, Bridges was
5 sentenced to 71 months in prison on each count to be served concurrently.

6 Defendant's motion for return of his passport was filed two days after the filing of his notice of
7 appeal of both his conviction and sentence. Dkt. No. 103. Bridges' motion seeks an order from the Court
8 directing the Pretrial Services Office to "hold [his] passport until such time that [he] is placed into custody.
9 At that time, [he] requests that the passport be returned to his legal representative." Dkt. No. 105.

10 The United States submits that such a motion is both premature given the notice of appeal filed by
11 Bridges and cause for concern given Bridges' conduct since surrendering his passport. First, the motion
12 is premature as Bridges was not remanded into custody at the sentencing hearing as requested by the
13 government. Instead, Bridges was permitted to self-surrender once he received a report date from the
14 Bureau of Prisons, which will likely be sometime around the end of January 2016. Bridges' notice of
15 appeal raises the issue of whether he will seek to remain on release pending his appeal. His motion does
16 not address this issue. Moreover, his reference to being "being placed into custody" is vague on its face.

17 Second, as the Court is aware, Bridges made repeated attempts to change his identity between the
18 time of his arrest and the time that he entered his guilty plea in this case. This unusual behavior – coupled
19 with other factors -- prompted the United States to seek the withdrawal of Bridges' release pending his
20 guilty plea and sentencing. Although the government's requests were denied, in both instances the Court
21 imposed further restrictive release conditions upon Bridges. The return of Bridges' passport to anyone,
22 including his "legal representative", should not occur until after he has served his entire sentence in this
23 case. Moreover, defense counsel has informed counsel for the government that he will not be representing
24 Bridges on appeal which casts doubt on who, in fact, is Bridges' legal representative.

25 For the reasons stated above, the United States respectfully requests that the Court deny the subject
26 motion.

1 DATED: December 22, 2015

Respectfully submitted,

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3 BRIAN J. STRETCH
4 Acting United States Attorney

5 _____/s/
6 KATHRYN HAUN
7 WILLIAM FRENTZEN
8 Assistant United States Attorneys

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10 RICHARD B. EVANS
11 Public Integrity Section
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